

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
vs.	§	CRIMINAL NO. 15-CR-00263
	§	
ASHER ABID KHAN	§	

AGREED MOTION FOR PROTECTIVE ORDER

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States of America, by and through its United States Attorney, Kenneth Magidson, and Assistant United States Attorneys, Carolyn Ferko and Alamdar Hamdani, for the Southern District of Texas and respectfully applies for a protective order to facilitate the United States’ production of discovery to defendant’s counsel.

Pursuant to its discovery obligations in this case, the United States wants to disclose to defendant’s counsel in discovery certain materials that the United States’ represents implicate third-party privacy information and law enforcement sensitive information. The United States also wishes to prevent any harassment to possible witnesses.

Furthermore, there are particular sensitivities associated with the disclosure of investigative methods, names and contact information of witnesses, and

information regarding minors. The material cannot be redacted adequately because it has evidentiary value in this case. In addition, the majority of these materials are electronic in origin, making mitigation of these concerns through redaction problematic. All these materials are collectively referenced in the proposed Order as “Protective Order Material(s).”

Defendant’s counsel, Thomas S. Berg, has no objection to the proposed protective order and no objection to this application for the proposed protective order.

Respectfully submitted,

KENNETH MAGIDSON
United States Attorney

By: /s/ Carolyn Ferko

CAROLYN FERKO
Assistant United States Attorney
U.S. Attorney’s Office
1000 Louisiana, Ste. 2300
Houston, Texas 77002
(713) 567-9562

/s/ Alamdar S. Hamdani

ALAMDAR S. HAMDANI
Assistant United States Attorney
U.S. Attorney’s Office
1000 Louisiana, Ste. 2300
Houston, Texas 77002
(713) 567-9562

CERTIFICATE OF SERVICE

This is to certify that on this 22ND day of June, 2015, a true and correct copy of the foregoing MOTION FOR AGREED MOTION FOR PROTECTIVE ORDER was served electronically to the following:

Tom Berg
Mallett | Saper | Berg, L.L.P.
Campanile South
4306 Yoakum Blvd., Suite 400
Houston, TX 77006
713-236-1900
tomberg@msblawyers.com

Counsel for Asher Abid Khan

By: /s/ Carolyn Ferko
CAROLYN FERKO
Assistant United States Attorney

/s/ Alamdar S. Hamdani
ALAMDAR S. HAMDANI
Assistant United States Attorney